

HENRY L. KIM*
CELINA M. CHO**
JOSHUA S. LIM*
KENDAL SIM*
SEOKCHAN (SEAN) KWAK*
NICHOLAS J. DUBOIS*
SHAWN S. LEIGH***
P. JOHN CHEN*



KIM, CHO & LIM, LLC
Attorneys at Law

NY Office:
164-01 Northern Boulevard
2nd Floor
Flushing, NY 11358
T: 718.539.7400
F: 917.463.1590

* Admitted in NJ & NY
** Admitted in AZ only
*** Admitted in NJ, NY and TX

460 Bergen Boulevard, Suite 305, Palisades Park, NJ 07650
T: 201.585.7400 F: 201.585.7422

Reply to NJ Address only

August 17, 2021

VIA ECF
Southern District of New York
ATTN: HON. ALISON J. NATHAN, U.S.D.J.
40 Foley Square, Room 2102
New York, New York 10007

**RE: HYUNHUY NAM v. PERMANENT MISSION OF THE REPUBLIC OF SOUTH
KOREA TO THE UNITED NATIONS, et al.
CASE NO.: 1:21-cv-06165-AJN**

Dear Judge Nathan,

This firm represents all the Defendants in the above-referenced matter (the “Defendants”). We write to request an extension of Defendants’ time to answer or otherwise move as to the complaint of Plaintiff Hyunhuy Nam (the “Plaintiff”) to and including September 30, 2021.

At this juncture, it is unclear when Defendants’ answer is due. Plaintiff has not filed certifications of service with respect to the Defendants and such service may have been defective. This office contacted Plaintiff’s counsel (“Counsel”) on August 13, 2021, requesting the abovementioned extension. To date, Counsel has not provided a response to such request. This is the first request for an adjournment/extension in this action.

The extension is necessary for this office to comply with its obligations under Fed. R. Civ. P. 11. It will allow this office to conduct appropriate research, discuss this matter with Defendants and their representatives, and appropriately respond to the complaint in accordance with the Federal Rules of Civil Procedure.

Additionally, Defendants reserve all defenses to the lawsuit including, but not limited to, those sounding in personal jurisdiction, subject-matter jurisdiction, venue, and immunity.

Thank you for your time and consideration in this matter.

Very truly yours,

/s/ Power J. Chen

Power J. Chen